

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:)
) **CHAPTER 7**
)
 JESSLYN RENEE ANDERSON,) **BANKRUPTCY NO. 17-15492**
)
 Debtor.) **RESPONSE TO TRUSTEE'S**
) **AMENDED OBJECTION TO**
) **EXEMPTIONS**

COME NOW the above-named Debtor by and through her undersigned attorney, **Tom Lester**, of the law firm of Lester & Associates, P.S., Inc., and responds to the Trustee's Amended Objection to Exemptions.

On the petition date, December 21, 2017, Debtor Jesslyn Anderson resided in the property at 2851 Brown Road, Ferndale, Washington. *RCW 6.13.010* provides for a homestead to be established by residing in a property owned by the claimant. The window for objection to the exemptions closed February 21, 2018 (thirty days after the meeting of creditors). This amended objection to exemptions was filed June 20, 2019. An original objection simply questioning value of exemption was filed on February 19, 2018 but no hearing was ever set.

**RESPONSE TO TRUSTEE'S
AMENDED OBJECTION TO
EXEMPTIONS - 1 -**

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1 Under the snap-shot rule¹ if a homestead existed on the date of the petition that is the end
2 of the inquiry.² The Trustee's reliance on *Jacobson*³ is misplaced. This is not a reinvestment
3 situation like *Jacobson* where a claimant must reinvest proceeds within a certain period to
4 comply with the homestead statute. Here, the fact the debtor resided at the homestead property
5 on the date of the petition satisfies the homestead statutes' requirements. No further conditions
6 must be met to establish the homestead. Considering activity after the snap-shot period is in
7 direct conflict with the snap-shot rule.
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10 Consequently, Debtor respectfully requests Trustees' amended objection to exemptions
11 be denied.

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13 **RESPECTFULLY SUBMITTED** this 19th day of July, 2019.

14 /s/ Tom Lester
15 **Tom Lester, WSBA #15814**
16 Attorney for Debtor
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26 ¹ *White v. Stump*, 266 U.S. 310, 313 (1924)

27 ² *Id.*

28 ³ *In re Jacobson*, 676 F. 3d 1193.